

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Pshatoia LaRose  
2221 Peachtree Rd. #222  
Atlanta, GA 30309

Petitioner

V.

Case No. \_\_\_\_\_

Sean Combs  
Combs Defendants  
1440 Broadway Floor Frnt 3  
New York, NY 10018

Respondent

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PLAINTIFFS PETITION AND COMPLAINT

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COMES NOW, Petitioner Pshatoia LaRose, and states the following:

Plaintiff alleges that Respondent, Sean Combs through the entities of Combs Enterprise and Combs Global, as well as individually, committed the acts of violating the intellectual property rights of Plaintiff's phone contents and conversations, which were re-used in publications, as well as the invasion of privacy and harassment. All Defendants included in the Initial Complaint are included in this complaint. The Respondent caused harm and loss to Plaintiff both directly and indirectly through third party associations, horoscope script writings, and Respondent's brand. As a result of Respondent's actions, Petitioner has experienced severe financial loss and pain and suffering which has resulted in irreparable harm and loss to Petitioner. Plaintiff seeks damages of \$521 million.

Defendant has also violated the Lanham Act, which provides that "Any person who, on or in connection with any goods or services, or any container for goods, uses in commerce any word, term, name, symbol, or device, or any combination thereof, or any false designation of origin, false or misleading description of fact, or false or misleading representation of fact, which— (A) is likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection, or association of such person with another person, or as to the origin, sponsorship, or approval of his or her goods, services, or commercial activities by another person." 15 U.S. C. § 1125(a)(1). In addition, Defendant violated Trade Secrets Act of 2016 and continuous Stalking and Invasion of Privacy of unauthorized reuse of Plaintiff's Phone Contents, Images and

Personal Property and is thus liable under the Lanham Act. Defendant has reused Plaintiff, Pshatoia LaRose contents for inspiration for both Business and Personal use ranging from Creating Products, Music Graphics, Social Media Post but not limited to only these accusations that shall result in Injunctions on these Products until Damages are awarded to Plaintiff.

Plaintiff, Pshatoia LaRose filed Domestic Violence suit against Defendant, Sean Combs prior to any Recent suits or alleged Claims against Defendant. Defendant has already made a settlement to another party, Cassandra Ventura, for similar claims to Plaintiff's, and there are other cases ongoing involving Defendant. Defendant has been in the news frequently regarding similar cases and allegations. Four women, including Ms. Ventura, have filed against Defendant for abuse and sexual assault, filing in the New York Superior Court. Combs repetitive Domestic Violence actions under further Review and Scrutiny in regards to this Case and several others shall proceed with Civil Justice by Jury Trial as well as Criminal Charges. Plaintiff, Pshatoia LaRose is stalked Daily prior to Suit and after Suit has been filed regarding Claims stated in Complaint.

Petitioner respectfully asks this Court for damages owing from Defendant's conduct be held in The United States District Court, Southern District of New York via Jury Trial, as well as for an order for Respondent to disclose all horoscope websites that he operates or is associated with, as well as for any other relief that this Court may deem proper. After further review of Appendix, This Case shall proceed and be set for a speedy Jury Trial to ensure Good Faith, Fairness, and Ethical Actions within the Judicial System to refrain continuous Stalking, Violation of Privacy, Lanham Act and Trade Secrets of 2016 by Repetitive Domestic Violence Offender, Sean Combs who shall be held accountable in the Court of Law.

Respectfully submitted,



Pshatoia LaRose  
Plaintiff

Pshatoia LaRose  
2221 Peachtree Rd #222  
Atlanta, GA 30309  
LaRose.PN@gmail.com  
404-450-7210  
222

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Phatna Lakose

Write the full name of each plaintiff.

\_\_\_\_ CV \_\_\_\_  
(Include case number if one has been assigned)

-against-

**COMPLAINT**

Stan Combs

Combs Defendants (please see attached)

Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

**NOTICE**

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

**Combs Defendants :**

Combs Enterprises  
Combs Global  
Sean Combs Capital  
Ciroc  
Deleon Tequila  
Bad Boy Entertainment  
Revolt Media and TV LLC  
Bad Boy Records  
Epic Records  
Capital Preparatory Charter School  
Love Records  
The Sean Combs Foundation  
Sean John

## I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

- ☐ Federal Question  
☒ Diversity of Citizenship

### A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

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### B. If you checked Diversity of Citizenship

#### 1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, Pshat'ia Lakose, is a citizen of the State of  
(Plaintiff's name)

GEORGIA  
(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

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If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, JEAN CUMBS, is a citizen of the State of  
(Defendant's name)

NEW YORK

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If the defendant is a corporation:

The defendant, ALL DEFENDANTS / CORPORATION LISTED IN CASE EXCEPT THE, is incorporated under the laws of NEW YORK  
the State of NEW YORK

and has its principal place of business in the State of NEW YORK

or is incorporated under the laws of (foreign state) \_\_\_\_\_

and has its principal place of business in NEW YORK

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Phatonia N Lakose  
First Name Middle Initial Last Name

222 Peachtree Rd #222  
Street Address

Fulton, Atlanta GA 30309  
County, City State Zip Code

404.450.7210 LAKOSE, PN@gmail.com  
Telephone Number Email Address (if available)

**B. Defendant Information**

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: SEAN COMBS  
First Name Last Name

Current Job Title (or other identifying information)

1440 Broadway Floor Pent 3

Current Work Address (or other address where defendant may be served)

NEW YORK, NEW YORK NY 10018

County, City

State

Zip Code

Defendant 2: Bad Boy Entertainment  
First Name Last Name

Current Job Title (or other identifying information)

1710 Broadway

Current Work Address (or other address where defendant may be served)

NEW YORK, NEW YORK NY 10019

County, City

State

Zip Code

Defendant 3: BPIC Records  
First Name Last Name

Current Job Title (or other identifying information)

25 Madison Ave

Current Work Address (or other address where defendant may be served)

NEW YORK, NEW YORK NY 10010

County, City

State

Zip Code

Defendant 4:

Capital Preparatory Charter School

First Name

Last Name

Current Job Title (or other identifying information)

2041 Madison Ave

Current Work Address (or other address where defendant may be served)

New York, New York

NY

10035

County, City

State

Zip Code

## III. STATEMENT OF CLAIM

Place(s) of occurrence:

Nationwide / Virtual

Date(s) of occurrence:

2022 - ongoing

FACTS:

(May be prior to this date as well)

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

Defendant, Sean Combs, including additional Defendants and/or as well as others not listed on case that Defendant is associated with, owns, or is hired by has hacked and continues to hack Plaintiff, Pshatria LaRose, Electronic Devices for Business and personal use; Using Unauthorized Phone contents of Plaintiff, Pshatria LaRose, Stalking, invasion of privacy and violation of intellectual property rights, Labor Law Act and Trade Secret Act of 2016 are stated and identified in Plaintiff's Amended Complaint and Appendix Attached (78 pgs.) Plaintiff, Pshatria LaRose also has witness that our conversations are monitored daily for Defendant's Business use. Defendant, Sean Combs, and Defendants have Reused Plaintiff Pshatria LaRose



Phone contents are inspiration to create products, including cover bottle cover ways, music graphics, CD covers, music videos, social media post but not limited to only topics mentioned above that are sold or advertised internationally. Resulting in current and future, issues, emotional distress, defamation, <sup>costly safety precautions</sup> (Please see attached Amended Complaint) and appendix for further information

#### INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

Hospitalization - 1 day - Foot swelling, Body Scan  
Injections, medication and Hospital Bed Rest

#### IV. RELIEF

State briefly what money damages or other relief you want the court to order.

Award Damages in the amount of \$521 million.  
Restraining order against Defendant, Sean  
Combs and Defendants listed, along with any  
Third Parties not listed that Defendant owns  
or is paid by.

Additional Defendants Address:

Combs Enterprises 1440 Broadway Floor 3 New York, NY 10018

Sean Combs Capital

Circa

DeLeon Tequila 1575 Abbott Kinney Boulevard Venice Los Angeles, CA 90291

Bad Boy Records 1710 Broadway New York, NY 10019

DOE CORPS

LOVE RECORDS

The Sean Combs Foundation 9255 W Sunset Blvd FL 2 West Hollywood, CA 90069

Sean John 525 Seventh Avenue Suite 1009 New York, NY 10018

IF address is left blank still researching

**V. PLAINTIFF'S CERTIFICATION AND WARNINGS**

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IEP application.

11/19/2024  
 Dated \_\_\_\_\_  
Ponathia N LaRose  
 First Name Middle Initial Last Name  
2221 Peachtree Rd #222  
 Street Address  
Fulton, Atlanta GA 30309  
 County, City State Zip Code  
404.450.7210 LaRose.PN@gmail.com  
 Telephone Number Email Address (if available)

I have ☒ read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:  
☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.